

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

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**JEROME WILLIAMS and CHERYL ANN  
DOCKERY, on behalf of themselves  
and others similarly situated,**

**Plaintiffs,**

**No. 2:09-cv-2376**

**v.**

**HOOAH SECURITY SERVICES, LLC,  
a domestic limited liability company and  
RIC BAILEY, individually,**

**Defendants.**

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**PLAINTIFF'S NOTICE OF 30(b)(6) DEPOSITION**

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To: HOOAH SECURITY SERVICES, LLC  
c/o Attorney Geoffrey Gaia  
McWhirter, Wyatt & Elder, PLLC  
73 Union Avenue  
Memphis, TN 38103

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, counsel for the Plaintiff, will take the deposition of the defendant, HOOAH SECURITY SERVICES, LLC, on Wednesday, February 23, 2011 at 11:00 a.m. at the Law offices of McWhirter, Wyatt & Elder, PLLC located at 73 Union Avenue, Memphis, Tennessee 38103.

The deposition will be taken by oral testimony under oath before an officer authorized to administer oaths, and will continue from day to day until completed. The deposition may be taken by stenographic transcription as well as by audio-visual means. In accordance with Rule 30(b)(6) of the Federal Rules of Civil Procedure, you may designate one or more officers,

directors, managing agents, or other persons who consent to testify on your behalf to testify with regard to the following; and to bring, produce and designate documents relative to the same pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure and any and all other applicable rules:

1. Testimony and documents evidencing or relating to the hours worked by Plaintiffs while in the employment of the Defendant; and
2. Testimony and documents evidencing or relating to the titles, responsibilities and duties of Plaintiffs while in the employment of the Defendant;
3. Testimony and documents evidencing or relating to the manner in which Plaintiffs were compensated while in the employment of the Defendant;
4. Testimony and documents evidencing or relating to exactly how you contend your pay practices complied with the FLSA;
5. Testimony and documents evidencing or relating to the name, last known address, present whereabouts, telephone number and place of employment of each person known or believed by you who, at any time from January 1, 2006, through the current date, acted directly or indirectly in your interest in relation to the Plaintiffs and those similarly situated to him;
6. Testimony and documents evidencing or relating to the name, last known address, present whereabouts, telephone number and place of employment of each person known or believed by you who, at any time from January 1, 2006 through the current date, served as an owner, operator, member corporate officer, or supervisor for Defendant; and,
7. Testimony and documents pertaining to the assets and corporate status of Defendant at all time material to this matter.

Said deposition(s) will be taken for the purposes as are permitted under the Rules which govern the conduct of the case.

Respectfully Submitted,

MORGAN & MORGAN, PA

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**CERTIFICATE OF SERVICE**

I, Justin M. Ross, certify that a copy of the foregoing pleading was served via regular electronic mail and this courts electronic filing system on the following attorney of record on this 9<sup>th</sup> day of February, 2011:

Geoffrey Gaia  
William Wyatt  
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[Geoffrey@mcwhirter-wyatt.com](mailto:Geoffrey@mcwhirter-wyatt.com)

s/Justin M. Ross  
JUSTIN M. ROSS